

Message

From: Keigwin, Richard [Keigwin.Richard@epa.gov]
Sent: 11/16/2017 8:49:19 PM
To: Jackson, Ryan [jackson.ryan@epa.gov]; Beck, Nancy [Beck.Nancy@epa.gov]
CC: Lyons, Troy [lyons.troy@epa.gov]; Sands, Jeffrey [sands.jeffrey@epa.gov]; Dourson, Michael [dourson.michael@epa.gov]; Baptist, Erik [baptist.erik@epa.gov]
Subject: RE: PRIA

Thanks Ryan. Hopefully the explanation below will help.

On the FIFRA fund side, not having the maintenance fee collection authority jeopardizes our ability to meet the October 2022 deadline for completing the first round of registration review. In the short term, we probably wouldn't feel an immediate effect on FTE reductions, however, because we have some carryover in the fund from accumulated balances from previous years' collections that have not been fully spent. As the end of this fiscal year approached, however, we would have to begin thinking about staff reductions. Several staff would likely leave immediately upon termination of PRIA because they would feel a lack of certainty in having their jobs. Frankly, we are already seeing that now.

On the PRIA fund side, we would immediately go into a reduced fee collection mode triggered by PRIA-3. The work still comes in, but we don't get the full fee (60% of the fee in the first year of the phase-out; 30% of the fee for applications submitted in the second year of the phase-out) and registrants don't get the statutory timelines. As with the FIFRA fund fees, I would expect several staff would likely leave immediately because they would feel a lack of certainty in having their jobs. And, the registrants would continue to put significant pressure on the agency to complete reviews in a timely manner, even though the resources would not fully be there to support the activity.

As you note, we have about 200 FTE funded with fees. As we continued to utilize the remaining fees, as we do now, we would need to aggressively manage FTE based on the availability of fees. There is certainly the potential, perhaps as early as the end of FY18, that we would need to consider some process for staff reductions. I don't think the 200 FTE reduction would be immediate, but I also know that there are a lot of people that have said that if PRIA is renewed, they will voluntarily separate very quickly.

From: Jackson, Ryan
Sent: Thursday, November 16, 2017 3:14 PM
To: Keigwin, Richard <Keigwin.Richard@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>
Cc: Lyons, Troy <lyons.troy@epa.gov>; Sands, Jeffrey <sands.jeffrey@epa.gov>; Dourson, Michael <dourson.michael@epa.gov>; Baptist, Erik <baptist.erik@epa.gov>
Subject: RE: PRIA

I'm trying to ascertain the severity of a lack of a reauthorization of PRIA December 8 and how long funds last until we are in a situation where our work load drops by a third. I'm also trying to ascertain what we do with the FTEs (which I understand is 200) which no longer have a funding source.

From: Keigwin, Richard
Sent: Thursday, November 16, 2017 1:30 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Cc: Jackson, Ryan <jackson.ryan@epa.gov>; Lyons, Troy <lyons.troy@epa.gov>; Sands, Jeffrey <sands.jeffrey@epa.gov>; Dourson, Michael <dourson.michael@epa.gov>; Baptist, Erik <baptist.erik@epa.gov>
Subject: Re: PRIA

Sorry for the delay. I wanted to get confirmation on the status of the two funds.

The FIFRA fund (which mostly supports the registration review/re-evaluation program) currently has a balance of approximately **\$35 million**. Based on past years' expenditures and the planned increased utilization of the fund to pay reimbursable FTE salaries, this figure represents about 1-2 years of monies to be drawn from the fund, provided any draw down can be coupled with matching (i.e., dollar for dollar) congressional appropriations, as currently required by FIFRA (NOTE: PRIA4 would eliminate this requirement for a dollar for dollar match). One thing to remember is that the President's FY18 Budget Proposal assumes a substantial draw down from the fund in lieu of congressional appropriations to support activities in the Office of Pesticide Programs. Keep in mind that new dollars come into the fund only once a year.

The PRIA fund currently has a balance of approximately **\$13 million**. Last year we expended over \$14 million from the PRIA fund. With the planned increased utilization of the fund to pay reimbursable FTE salaries, I would anticipate that we will spend upwards of \$16-17 million from the PRIA fund during FY18. Unlike the FIFRA Fund, however, new dollars are regularly coming into the fund as registrants submit new registration applications. We are developing a plan to reduce the amount of year-to-year carryover in the PRIA fund, consistent with a recent recommendation that we've received from the Office of the Inspector General.

Rick Keigwin
Director, Office of Pesticide Programs
U.S. Environmental Protection Agency
Phone: 703-305-7090
Website: www.epa.gov/pesticides
Sent from my iPhone

On Nov 15, 2017, at 9:19 PM, Beck, Nancy <Beck.Nancy@epa.gov> wrote:

We actually have a lot in the bank. The OIG has not been happy about that.
Rick- do you know exactly how much?
Thanks.

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP

Ex. 6 Personal Privacy (PP)

Beck.Nancy@epa.gov

On Nov 15, 2017, at 8:55 PM, Jackson, Ryan <jackson.ryan@epa.gov> wrote:

How much do we have in the bank and could run near 100% anyway?

Ryan Jackson
Chief of Staff
U.S. EPA
(202) 564-6999

On Nov 15, 2017, at 8:38 PM, Beck, Nancy <Beck.Nancy@epa.gov> wrote:

Ryan,
Heres what I've learned, if there is no PRIA:

- There is no way for us to accept money from registrants (after the 2 year phase down). For registration review, we can only

draw on banked/already collected fees if paired with a dollar-for-dollar match from appropriated funds.

- We would lose about \$45 Million in funds (about 200 FTE)
- There is a 2 year phase down for registrations—year one: collect 60% of fee, no timeframes are required for completing reviews; year 2: collect 30% of fee, no timeframes are required for completing reviews
- Registrants and growers lose predictability in decision times.

I'll ask others to chime in as well—thanks.
Please let me know if you have other questions.

Nancy

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Nancy B. Beck, Ph.D., DABT
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